

1 sales outside of the United States and unrelated to United States commerce, as such sales are
 2 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 3 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 4 evidence.

5 Responding Party objects to this request on the grounds that it seeks production of
 6 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 7 common interest privilege, or by any other applicable doctrine or privilege.

8 Responding Party objects to this request on the grounds it seeks information and/or
 9 documents that would disclose confidential information protected by any and all rights of privacy
 10 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 11 from disclosure because to do so would cause Responding Party to violate legal and/or
 12 contractual obligations to any other persons or entities.

13 Responding Party objects to this request on the grounds that, to the extent it seeks
 14 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 15 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 16 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 17 action, and not reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 19 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 20 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 21 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 22 statute of limitations.

23 Responding Party objects to the extent this request seeks documents that are no longer
 24 active or readily accessible in electronic form which renders this request overly broad and unduly
 25 burdensome.

26 Responding Party objects to the extent this request seeks documents or information that is
 27 not within the possession, custody, or control of Responding Party.

28 Responding Party objects that the phrase "relationship between prices" is vague and

1 ambiguous, rendering this request overly broad and unduly burdensome, not relevant and not
2 reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent this request seeks document relating to “costs of
4 production, marketing, or selling or distributing CRT or CRT Products,” it is duplicative of
5 Request No. 12 of the Document Requests.

6 Responding Party objects to the extent this request seeks documents or information that
7 require discovery of information and materials from third parties or sources that are equally if not
8 more accessible to Plaintiffs.

9 Responding Party objects to the extent this request seeks documents concerning the
10 “prices of CRTs” and “costs of producing” CRTs, this request is duplicative of Document
11 Request Nos. 8 and 12 of the Document Requests.

12 Responding Party objects to the extent this request seeks documents or information that
13 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

14 Subject to and without waiving the general and specific objections stated above,
15 Responding Party responds that it will make reasonable efforts to identify documents responsive
16 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
17 documents.

18 **REQUEST NO. 16 [SIC] REQUEST NO. 21:**

19 All of Your internal and public annual, quarterly and monthly financial statements,
20 summaries or analyses, including profit-and-loss statements and comparisons to budget that relate
21 to CRT or CRT Products.

22 **RESPONSE TO REQUEST NO. 16 [SIC] REQUEST NO. 21:**

23 Responding Party reasserts and incorporates each of the General Objections and
24 Objections to Definitions and Instructions set forth above.

25 Responding Party objects to this request on the grounds that it is overly broad, unduly
26 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
27 including to the extent that it seeks the discovery of documents regarding Responding Party’s
28 sales outside of the United States and unrelated to United States commerce, as such sales are

1 beyond the scope of this litigation and thereby render the Document Requests overly broad,
2 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request on the grounds that it seeks production of
5 documents protected by the attorney-client privilege, work product doctrine, joint defense or
6 common interest privilege, or by any other applicable doctrine or privilege.

7 Responding Party objects to this request on the grounds it seeks information and/or
8 documents that would disclose confidential information protected by any and all rights of privacy
9 under the United States Constitution or any other applicable law, or that is otherwise prohibited
10 from disclosure because to do so would cause Responding Party to violate legal and/or
11 contractual obligations to any other persons or entities.

12 Responding Party objects to this request on the grounds that, to the extent it seeks
13 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
14 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
15 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
16 action, and not reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
18 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
19 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
20 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
21 statute of limitations.

22 Responding Party objects to the extent this request seeks documents or information that is
23 not within the possession, custody, or control of Responding Party.

24 Subject to and without waiving the general and specific objections stated above,
25 Responding Party responds that it will make reasonable efforts to identify documents responsive
26 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
27 documents.

REQUEST NO. 17 [SIC] REQUEST NO. 22:

All business plans, planning analyses, budgets, forecasts, or sales or profit projections relating to CRT or CRT Products.

RESPONSE TO REQUEST NO. 17 [SIC] REQUEST NO. 22:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of

1 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 2 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 3 statute of limitations.

4 Responding Party objects to the extent this request seeks documents that are no longer
 5 active or readily accessible in electronic form which renders this request overly broad and unduly
 6 burdensome.

7 Responding Party objects to the extent this request seeks documents or information that is
 8 not within the possession, custody, or control of Responding Party.

9 Responding Party objects that the phrase "business plans, planning analyses, budgets,
 10 forecasts, or sales or profit projections" is vague and ambiguous, rendering this request overly
 11 broad and unduly burdensome, not relevant and not reasonably calculated to lead to the discovery
 12 of admissible evidence.

13 Responding Party objects to the extent this request seeks documents or information that
 14 require discovery of information and materials from third parties or sources that are equally if not
 15 more accessible to Plaintiffs.

16 Responding Party objects to the extent this request seeks documents or information that
 17 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

18 Subject to and without waiving the general and specific objections stated above,
 19 Responding Party responds that it will make reasonable efforts to identify documents responsive
 20 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
 21 documents.

22 **REQUEST NO. 18 [SIC] REQUEST NO. 23:**

23 Documents sufficient to show the identity of all other producers and sellers of CRT or
 24 CRT Products during any portion of the relevant period.

25 **RESPONSE TO REQUEST NO. 18 [SIC] REQUEST NO. 23:**

26 Responding Party reasserts and incorporates each of the General Objections and
 27 Objections to Definitions and Instructions set forth above.

28 Responding Party objects to this request on the grounds that it is overly broad, unduly

1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
2 including to the extent that it seeks the discovery of documents regarding Responding Party's
3 sales outside of the United States and unrelated to United States commerce, as such sales are
4 beyond the scope of this litigation and thereby render the Document Requests overly broad,
5 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to this request on the grounds that it seeks production of
8 documents protected by the attorney-client privilege, work product doctrine, joint defense or
9 common interest privilege, or by any other applicable doctrine or privilege.

10 Responding Party also objects on the grounds it seeks information and/or documents that
11 would disclose confidential information protected by any and all rights of privacy under the
12 United States Constitution or any other applicable law, or that is otherwise prohibited from
13 disclosure because to do so would cause Responding Party to violate legal and/or contractual
14 obligations to any other persons or entities.

15 Responding Party objects on the grounds that, to the extent it requests documents
16 regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous,
17 overly broad and unduly burdensome, and purports to call for information that is not relevant to
18 the claim or defense of any party, not relevant to the subject matter involved in this action, and
19 not reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
21 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
22 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
23 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
24 statute of limitations.

25 Responding Party objects to the extent this request seeks documents that are no longer
26 active or readily accessible in electronic form which renders this request overly broad and unduly
27 burdensome.

28 Responding Party objects to the extent this request seeks documents or information that is

1 not within the possession, custody, or control of Responding Party.

2 Responding Party objects that by seeking documents and information regarding "all other
3 producers and sellers of CRT or CRT Products," the request is overly broad and unduly
4 burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to the extent this request seeks documents or information that
7 require discovery of information and materials from third parties or sources that are equally if not
8 more accessible to Plaintiffs.

9 Responding Party objects to the extent this request seeks documents or information that
10 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

11 Subject to and without waiving the general and specific objections stated above,
12 Responding Party responds that it will make reasonable efforts to identify documents responsive
13 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
14 documents.

15 **REQUEST NO. 19 [SIC] REQUEST NO. 24:**

16 All Documents relating to Your percentage or share of industry production, capacity, sales
17 or shipments of CRT or CRT Products, or the percentage or share of industry production,
18 capacity, sales or shipments of any other producer or seller of CRT or CRT Products at any time
19 during the period January 1, 1991 through the present.

20 **RESPONSE TO REQUEST NO. 19 [SIC] REQUEST NO. 24:**

21 Responding Party reasserts and incorporates each of the General Objections and
22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
25 including to the extent that it seeks the discovery of documents regarding Responding Party's
26 sales outside of the United States and unrelated to United States commerce, as such sales are
27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party also objects on the grounds it seeks information and/or documents that
6 would disclose confidential information protected by any and all rights of privacy under the
7 United States Constitution or any other applicable law, or that is otherwise prohibited from
8 disclosure because to do so would cause Responding Party to violate legal and/or contractual
9 obligations to any other persons or entities.

10 Responding Party objects to this request on the grounds that, to the extent it requests
11 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
12 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
13 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
14 action, and not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
16 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
17 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
18 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
19 statute of limitations.

20 Responding Party objects to the extent this request seeks documents that are no longer
21 active or readily accessible in electronic form which renders this request overly broad and unduly
22 burdensome.

23 Responding Party objects to the extent this request seeks documents or information that is
24 not within the possession, custody, or control of Responding Party.

25 Responding Party objects that the phrase "percentage or share of industry production,
26 capacity, sales or shipments" is vague and ambiguous, rendering this request overly broad and
27 unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Responding Party objects to the extent this request seeks documents or information that
 2 require discovery of information and materials from third parties or sources that are equally if not
 3 more accessible to Plaintiffs.

4 Responding Party objects to the extent this request seeks documents or information that
 5 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

6 Subject to and without waiving the general and specific objections stated above,
 7 Responding Party responds that it will make reasonable efforts to identify documents responsive
 8 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
 9 documents.

10 **REQUEST NO. 20 [SIC] REQUEST NO. 25:**

11 All Documents showing the dollar volume or quantity of sales or shipments of CRT or
 12 CRT Products (by type or category, if available) by You or by other producers or sellers of CRT
 13 or CRT Products by month, quarter, calendar year or fiscal year during the period January 1, 1991
 14 through the present.

15 **RESPONSE TO REQUEST NO. 20 [SIC] REQUEST NO. 25:**

16 Responding Party reasserts and incorporates each of the General Objections and
 17 Objections to Definitions and Instructions set forth above.

18 Responding Party objects to this request on the grounds that it is overly broad, unduly
 19 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 20 including to the extent that it seeks the discovery of documents regarding Responding Party's
 21 sales outside of the United States and unrelated to United States commerce, as such sales are
 22 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 23 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 24 evidence.

25 Responding Party objects to this request on the grounds that it seeks production of
 26 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 27 common interest privilege, or by any other applicable doctrine or privilege.

28 Responding Party objects to this request on the grounds it seeks information and/or

1 documents that would disclose confidential information protected by any and all rights of privacy
2 under the United States Constitution or any other applicable law, or that is otherwise prohibited
3 from disclosure because to do so would cause Responding Party to violate legal and/or
4 contractual obligations to any other persons or entities.

5 Responding Party objects to this request on the grounds that, to the extent it seeks
6 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
7 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
8 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
9 action, and not reasonably calculated to lead to the discovery of admissible evidence.

10 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
11 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
12 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
13 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
14 statute of limitations.

15 Responding Party objects to the extent this request seeks documents that are no longer
16 active or readily accessible in electronic form which renders this request overly broad and unduly
17 burdensome.

18 Responding Party objects to the extent this request seeks documents or information that is
19 not within the possession, custody, or control of Responding Party.

20 Responding Party objects that the phrase "dollar volume" is vague, ambiguous, and
21 unintelligible, rendering the request overly broad and unduly burdensome, not relevant and not
22 reasonably calculated to lead to the discovery of admissible evidence.

23 Responding Party objects to the extent it seeks documents relating to the "quantity of sales
24 or shipments of CRT or CRT Products," this request is duplicative of Document Request No. 5 of
25 Plaintiffs' First Set of Requests for Production of Documents, and Request No. 5 of the
26 Document Requests.

27 Responding Party objects to the extent this request seeks documents or information that
28 require discovery of information and materials from third parties or sources that are equally if not

1 more accessible to Plaintiffs.

2 Responding Party objects to the extent this request seeks documents or information that
3 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

4 Subject to and without waiving the general and specific objections stated above,
5 Responding Party responds that it will make reasonable efforts to identify documents responsive
6 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
7 documents.

8 **REQUEST NO. 21 [SIC] REQUEST NO. 26:**

9 All Documents that compare or contrast each type, class, or category of CRT or CRT
10 Products produced or sold by You with that of any other producer or seller of CRT or CRT
11 Products and all Documents that relate to any industry standards regarding types, classes, or
12 categories of CRT or CRT Products.

13 **RESPONSE TO REQUEST NO. 21 [SIC] REQUEST NO. 26:**

14 Responding Party reasserts and incorporates each of the General Objections and
15 Objections to Definitions and Instructions set forth above.

16 Responding Party objects to this request on the grounds that it is overly broad, unduly
17 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
18 including to the extent that it seeks the discovery of documents regarding Responding Party's
19 sales outside of the United States and unrelated to United States commerce, as such sales are
20 beyond the scope of this litigation and thereby render the Document Requests overly broad,
21 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request on the grounds that it seeks production of
24 documents protected by the attorney-client privilege, work product doctrine, joint defense or
25 common interest privilege, or by any other applicable doctrine or privilege.

26 Responding Party objects to this request on the grounds it seeks information and/or
27 documents that would disclose confidential information protected by any and all rights of privacy
28 under the United States Constitution or any other applicable law, or that is otherwise prohibited

1 from disclosure because to do so would cause Responding Party to violate legal and/or
2 contractual obligations to any other persons or entities.

3 Responding Party objects to this request on the grounds that, to the extent it seeks
4 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
5 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
6 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
7 action, and not reasonably calculated to lead to the discovery of admissible evidence.

8 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
9 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
10 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
11 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
12 statute of limitations.

13 Responding Party objects to the extent this request seeks documents that are no longer
14 active or readily accessible in electronic form which renders this request overly broad and unduly
15 burdensome.

16 Responding Party objects to the extent this request seeks documents or information that is
17 not within the possession, custody, or control of Responding Party.

18 Responding Party objects that the phrases "compare or contrast" and "industry standards"
19 are vague, ambiguous, and unintelligible, rendering this request overly broad and unduly
20 burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Responding Party objects to the extent this request seeks documents or information that
23 require discovery of information and materials from third parties or sources that are equally if not
24 more accessible to Plaintiffs.

25 Responding Party objects to the extent this request is duplicative of Request No. 5 of the
26 Document Requests.

27 Responding Party objects to the extent this request seeks documents or information that
28 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

1 Subject to and without waiving the general and specific objections stated above,
 2 Responding Party responds that it will make reasonable efforts to identify documents responsive
 3 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
 4 documents.

5 **REQUEST NO. 22 [SIC] REQUEST NO. 27:**

6 Documents sufficient to show the regions or territories in which each type, class, or
 7 category of CRT or CRT Products are sold in the United States.

8 **RESPONSE TO REQUEST NO. 22 [SIC] REQUEST NO. 27:**

9 Responding Party reasserts and incorporates each of the General Objections and
 10 Objections to Definitions and Instructions set forth above.

11 Responding Party objects to this request on the grounds that it is overly broad, unduly
 12 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 13 including to the extent that it seeks the discovery of documents regarding Responding Party's
 14 sales outside of the United States and unrelated to United States commerce, as such sales are
 15 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 16 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 17 evidence.

18 Responding Party objects to this request on the grounds that it seeks production of
 19 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 20 common interest privilege, or by any other applicable doctrine or privilege.

21 Responding Party objects to this request on the grounds it seeks information and/or
 22 documents that would disclose confidential information protected by any and all rights of privacy
 23 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 24 from disclosure because to do so would cause Responding Party to violate legal and/or
 25 contractual obligations to any other persons or entities.

26 Responding Party objects to this request on the grounds that, to the extent it seeks
 27 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 28 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not

1 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
2 action, and not reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
4 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
5 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
6 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
7 statute of limitations.

8 Responding Party objects to the extent this request seeks documents that are no longer
9 active or readily accessible in electronic form which renders this request overly broad and unduly
10 burdensome.

11 Responding Party objects to the extent this request seeks documents or information that is
12 not within the possession, custody, or control of Responding Party.

13 Responding Party objects to the extent this request seeks documents or information that
14 require discovery of information and materials from third parties or sources that are equally if not
15 more accessible to Plaintiffs.

16 Responding Party objects to the extent this request seeks documents or information that
17 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

18 Subject to and without waiving the general and specific objections stated above,
19 Responding Party responds that it will make reasonable efforts to identify documents responsive
20 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
21 documents.

22 **REQUEST NO. 23 [SIC] REQUEST NO. 28:**

23 All Documents relating to conditions of supply or demand for CRT or CRT Products,
24 including, but not limited to, any market studies or industry reports during the period January 1,
25 1991 through the present.

26 **RESPONSE TO REQUEST NO. 23 [SIC] REQUEST NO. 28:**

27 Responding Party reasserts and incorporates each of the General Objections and
28 Objections to Definitions and Instructions set forth above.

1 Responding Party objects to this request on the grounds that it is overly broad, unduly
 2 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 3 including to the extent that it seeks the discovery of documents regarding Responding Party's
 4 sales outside of the United States and unrelated to United States commerce, as such sales are
 5 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 6 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 7 evidence.

8 Responding Party objects to this request on the grounds that it seeks production of
 9 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 10 common interest privilege, or by any other applicable doctrine or privilege.

11 Responding Party objects to this request on the grounds it seeks information and/or
 12 documents that would disclose confidential information protected by any and all rights of privacy
 13 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 14 from disclosure because to do so would cause Responding Party to violate legal and/or
 15 contractual obligations to any other persons or entities.

16 Responding Party objects to this request on the grounds that, to the extent it requests
 17 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 18 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 19 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 20 action, and not reasonably calculated to lead to the discovery of admissible evidence.

21 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 22 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 23 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 24 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 25 statute of limitations.

26 Responding Party objects to the extent this request seeks documents that are no longer
 27 active or readily accessible in electronic form which renders this request overly broad and unduly
 28 burdensome.

1 Responding Party objects to the extent this request seeks documents or information that is
2 not within the possession, custody, or control of Responding Party.

3 Responding Party objects that the phrases “relating to conditions of supply and demand”
4 and “market studies or industry reports” are vague, ambiguous, and unintelligible, rendering this
5 request overly broad and unduly burdensome, not relevant and not reasonably calculated to lead
6 to the discovery of admissible evidence.

7 Responding Party objects to the extent this request seeks documents or information that
8 require discovery of information and materials from third parties or sources that are equally if not
9 more accessible to Plaintiffs.

10 Responding Party objects to the extent this request seeks documents or information that
11 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

12 Subject to and without waiving the general and specific objections stated above,
13 Responding Party responds that it will make reasonable efforts to identify documents responsive
14 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
15 documents.

16 **REQUEST NO. 24 [SIC] REQUEST NO. 29:**

17 All Documents relating to any contemplated, proposed, planned, pending or executed
18 purchases, sales, acquisitions, mergers, joint ventures, divestitures, transfers, spin-offs or any
19 other change in ownership of any assets, liabilities, subsidiaries, departments, units or other
20 subdivisions of Your or another company relating to production, distribution, marketing, pricing,
21 sale or resale of CRT or CRT Products during the Relevant Time Period.

22 **RESPONSE TO REQUEST NO. 24 [SIC] REQUEST NO. 29:**

23 Responding Party reasserts and incorporates each of the General Objections and
24 Objections to Definitions and Instructions set forth above.

25 Responding Party objects to this request on the grounds that it is overly broad, unduly
26 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
27 including to the extent that it seeks the discovery of documents regarding Responding Party’s
28 sales outside of the United States and unrelated to United States commerce, as such sales are

1 beyond the scope of this litigation and thereby render the Document Requests overly broad,
2 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request on the grounds that it seeks production of
5 documents protected by the attorney-client privilege, work product doctrine, joint defense or
6 common interest privilege, or by any other applicable doctrine or privilege.

7 Responding Party objects to this request on the grounds it seeks information and/or
8 documents that would disclose confidential information protected by any and all rights of privacy
9 under the United States Constitution or any other applicable law, or that is otherwise prohibited
10 from disclosure because to do so would cause Responding Party to violate legal and/or
11 contractual obligations to any other persons or entities.

12 Responding Party objects to this request on the grounds that, to the extent it seeks
13 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
14 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
15 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
16 action, and not reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
18 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
19 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
20 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
21 statute of limitations.

22 Responding Party objects to the extent this request seeks documents that are no longer
23 active or readily accessible in electronic form which renders this request overly broad and unduly
24 burdensome.

25 Responding Party objects to the extent this request seeks documents or information that is
26 not within the possession, custody, or control of Responding Party.

27 Responding Party objects that the definition of the term "Your" renders the request vague,
28 ambiguous, and unintelligible, overly broad and unduly burdensome, not relevant, and not

1 reasonably calculated to lead to the discovery of admissible evidence.

2 Responding Party objects that the terms “contemplated,” “proposed,” “planned,”
3 “pending,” “executed” and “another company” are vague, ambiguous, and unintelligible,
4 rendering this request overly broad and unduly burdensome, not relevant and not reasonably
5 calculated to lead to the discovery of admissible evidence.

6 Responding Party objects to the extent this request seeks documents or information that
7 require discovery of information and materials from third parties or sources that are equally if not
8 more accessible to Plaintiffs.

9 Responding Party objects to the extent this request seeks documents and information that
10 would require disclosure of Responding Party’s or a third-party’s respective trade secrets or other
11 confidential information protected by the Uniform Trade Secrets Act, *et. seq.*, any and all rights
12 of privacy under the United States Constitution, or Article One of the California State
13 Constitution or other state constitutions, or any other applicable law, or which is otherwise
14 prohibited from disclosure because to do so would cause Responding Party to violate legal or
15 contractual obligations to any other persons or entities.

16 Responding Party objects that this request is overly broad and unduly burdensome, and
17 the burden it places on Responding Party far outweighs any likely benefit to Plaintiffs under Rule
18 26(b)(2)(C)(iii) of the Federal Rules of Civil Procedure.

19 Subject to and without waiving the general and specific objections stated above,
20 Responding Party responds that it will make reasonable efforts to identify documents responsive
21 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
22 documents.

23 **REQUEST NO. 25 [SIC] REQUEST NO. 30:**

24 All Documents relating to any communications between You and any parent, subsidiary,
25 affiliated company, joint venturer, or partner regarding the production, pricing, marketing, sale or
26 distribution of CRT or CRT Products.

27 **RESPONSE TO REQUEST NO. 25 [SIC] REQUEST NO. 30:**

28 Responding Party reasserts and incorporates each of the General Objections and

1 Objections to Definitions and Instructions set forth above.

2 Responding Party objects to this request on the grounds that it is overly broad, unduly
3 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
4 including to the extent that it seeks the discovery of documents regarding Responding Party's
5 sales outside of the United States and unrelated to United States commerce, as such sales are
6 beyond the scope of this litigation and thereby render the Document Requests overly broad,
7 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Responding Party objects to this request on the grounds that it seeks production of
10 documents protected by the attorney-client privilege, work product doctrine, joint defense or
11 common interest privilege, or by any other applicable doctrine or privilege.

12 Responding Party objects to this request on the grounds it seeks information and/or
13 documents that would disclose confidential information protected by any and all rights of privacy
14 under the United States Constitution or any other applicable law, or that is otherwise prohibited
15 from disclosure because to do so would cause Responding Party to violate legal and/or
16 contractual obligations to any other persons or entities.

17 Responding Party objects to this request on the grounds that, to the extent it seeks
18 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
19 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
20 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
21 action, and not reasonably calculated to lead to the discovery of admissible evidence.

22 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
23 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
24 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
25 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
26 statute of limitations.

27 Responding Party objects to the extent this request seeks documents that are no longer
28 active or readily accessible in electronic form which renders this request overly broad and unduly

1 burdensome.

2 Responding Party objects to the extent this request seeks documents or information that is
3 not within the possession, custody, or control of Responding Party.

4 Responding Party objects that the phrase "affiliated company" is vague, ambiguous, and
5 unintelligible, rendering this request overly broad and unduly burdensome, not relevant and not
6 reasonably calculated to lead to the discovery of admissible evidence.

7 Responding Party objects to the extent this request seeks documents or information that
8 require discovery of information and materials from third parties or sources that are equally if not
9 more accessible to Plaintiffs.

10 Responding Party objects that this request is overly broad and unduly burdensome, and
11 the burden it places on Responding Party far outweighs any likely benefit to Plaintiffs under Rule
12 26(b)(2)(C)(iii) of the Federal Rules of Civil Procedure.

13 Subject to and without waiving the general and specific objections stated above,
14 Responding Party responds that it will make reasonable efforts to identify documents responsive
15 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
16 documents.

17 **REQUEST NO. 26 [SIC] REQUEST NO. 31:**

18 All Documents relating to communications regarding CRT or CRT Products between or
19 among manufacturers of CRT or CRT Products, including Defendants.

20 **RESPONSE TO REQUEST NO. 26 [SIC] REQUEST NO. 31:**

21 Responding Party reasserts and incorporates each of the General Objections and
22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
25 including to the extent that it seeks the discovery of documents regarding Responding Party's
26 sales outside of the United States and unrelated to United States commerce, as such sales are
27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party objects to this request on the grounds it seeks information and/or
6 documents that would disclose confidential information protected by any and all rights of privacy
7 under the United States Constitution or any other applicable law, or that is otherwise prohibited
8 from disclosure because to do so would cause Responding Party to violate legal and/or
9 contractual obligations to any other persons or entities.

10 Responding Party objects to this request on the grounds that, to the extent it seeks
11 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
12 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
13 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
14 action, and not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
16 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
17 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
18 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
19 statute of limitations.

20 Responding Party objects to the extent this request seeks documents that are no longer
21 active or readily accessible in electronic form which renders this request overly broad and unduly
22 burdensome.

23 Responding Party objects to the extent this request seeks documents or information that is
24 not within the possession, custody, or control of Responding Party.

25 Responding Party objects to the extent this request seeks documents or information that
26 require discovery of information and materials from third parties or sources that are equally if not
27 more accessible to Plaintiffs.

28 Responding Party objects that the phrase "relating to" is vague, ambiguous and

1 unintelligible, and renders the request unlimited in scope, overly broad and unduly burdensome,
2 not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

3 Subject to and without waiving the general and specific objections stated above,
4 Responding Party responds that it will make reasonable efforts to identify documents responsive
5 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
6 documents.

7 **REQUEST NO. 27 [SIC] REQUEST NO. 32:**

8 All Documents relating to any Meeting attended by You or any other Defendant or any
9 manufacturer of CRT or CRT Products during which there was any communication concerning
10 the production, marketing, pricing, distribution, inventory levels or sale of CRT or CRT Products,
11 including, but not limited to the notes of any such Meetings.

12 **RESPONSE TO REQUEST NO. 27 [SIC] REQUEST NO. 32:**

13 Responding Party reasserts and incorporates each of the General Objections and
14 Objections to Definitions and Instructions set forth above.

15 Responding Party objects to this request on the grounds that it is overly broad, unduly
16 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
17 including to the extent that it seeks the discovery of documents regarding Responding Party's
18 sales outside of the United States and unrelated to United States commerce, as such sales are
19 beyond the scope of this litigation and thereby render the Document Requests overly broad,
20 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
21 evidence.

22 Responding Party objects to this request on the grounds that it seeks production of
23 documents protected by the attorney-client privilege, work product doctrine, joint defense or
24 common interest privilege, or by any other applicable doctrine or privilege.

25 Responding Party objects to this request on the grounds it seeks information and/or
26 documents that would disclose confidential information protected by any and all rights of privacy
27 under the United States Constitution or any other applicable law, or that is otherwise prohibited
28 from disclosure because to do so would cause Responding Party to violate legal and/or

1 contractual obligations to any other persons or entities.

2 Responding Party objects to this request on the grounds that, to the extent it seeks
3 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
4 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
5 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
6 action, and not reasonably calculated to lead to the discovery of admissible evidence.

7 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
8 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
9 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
10 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
11 statute of limitations.

12 Responding Party objects to the extent this request seeks documents that are no longer
13 active or readily accessible in electronic form which renders this request overly broad and unduly
14 burdensome.

15 Responding Party objects to the extent this request seeks documents or information that is
16 not within the possession, custody, or control of Responding Party.

17 Responding Party objects to the extent this request seeks documents or information that
18 require discovery of information and materials from third parties or sources that are equally if not
19 more accessible to Plaintiffs.

20 Subject to and without waiving the general and specific objections stated above,
21 Responding Party responds that it will make reasonable efforts to identify documents responsive
22 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
23 documents.

24 **REQUEST NO. 28 [SIC] REQUEST NO. 33:**

25 For each of Your Employees who has or had any non-clerical responsibility for
26 recommending, reviewing, setting or approving prices, price increase announcements, bids or
27 quotes for the sale of CRT or CRT Products, or any other involvement in the marketing or sale of
28 CRT or CRT Products:

- a. all copies of electronic and manual diaries, calendars, appointment books, "to do" lists, day timers or appointment notes;
- b. all copies of trip and travel logs, records or other supporting Documents;
- c. all copies of expense reports or other supporting Documents;
- d. all copies of telephone number logs, directories, notebooks, Rolodex cards or related memoranda;
- e. all bills, statements, records and supporting Documents concerning long distance or cellular telephone calls;
- f. all Documents relating to membership in any trade association or industry group; and
- g. the complete personnel file for that Employee.

RESPONSE TO REQUEST NO. 28 [SIC] REQUEST NO. 33:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or

1 contractual obligations to any other persons or entities.

2 Responding Party objects to this request on the grounds that, to the extent it seeks
3 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
4 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
5 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
6 action, and not reasonably calculated to lead to the discovery of admissible evidence.

7 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
8 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
9 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
10 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
11 statute of limitations.

12 Responding Party objects to the extent this request seeks documents that are no longer
13 active or readily accessible in electronic form which renders this request overly broad and unduly
14 burdensome.

15 Responding Party objects that the phrase "non-clerical responsibility" is vague,
16 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
17 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects to the extent this request seeks documents or information that
19 require discovery of information and materials from third parties or sources that are equally if not
20 more accessible to Plaintiffs.

21 Subject to and without waiving the general and specific objections stated above,
22 Responding Party responds that it will make reasonable efforts to identify documents responsive
23 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
24 documents.

25 **REQUEST NO. 29 [SIC] REQUEST NO. 34:**

26 Documents sufficient to show the name and address of each trade association (including
27 committees and subcommittees) relating to CRT or CRT Products of which You or any of Your
28 Employees are or have been a member, as well as Documents sufficient to show dates of

membership and dates of participation in committees or subcommittees.

RESPONSE TO REQUEST NO. 29 [SIC] REQUEST NO. 34:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the

1 statute of limitations.

2 Responding Party objects to the extent this request seeks documents that are no longer
3 active or readily accessible in electronic form which renders this request overly broad and unduly
4 burdensome.

5 Responding Party objects to the extent this request seeks documents or information that is
6 not within the possession, custody, or control of Responding Party.

7 Responding Party objects to the extent this request seeks documents or information that
8 require discovery of information and materials from third parties or sources that are equally if not
9 more accessible to Plaintiffs.

10 Subject to and without waiving the general and specific objections stated above,
11 Responding Party responds that it will make reasonable efforts to identify documents responsive
12 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
13 documents.

14 **REQUEST NO. 30 [SIC] REQUEST NO. 35:**

15 All Documents relating to Meetings of each trade association and each of its committees
16 or subcommittees relating to CRT or CRT Products, including all Documents relating to any such
17 Meeting attended by You and any other CRT or CRT Products manufacturer and Documents
18 sufficient to identify individuals from Your company who attended, the dates of attendance, and
19 the subject matters discussed.

20 **RESPONSE TO REQUEST NO. 30 [SIC] REQUEST NO. 35:**

21 Responding Party reasserts and incorporates each of the General Objections and
22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
25 including to the extent that it seeks the discovery of documents regarding Responding Party's
26 sales outside of the United States and unrelated to United States commerce, as such sales are
27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party objects to this request on the grounds it seeks information and/or
6 documents that would disclose confidential information protected by any and all rights of privacy
7 under the United States Constitution or any other applicable law, or that is otherwise prohibited
8 from disclosure because to do so would cause Responding Party to violate legal and/or
9 contractual obligations to any other persons or entities.

10 Responding Party objects to this request on the grounds that, to the extent it seeks
11 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
12 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
13 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
14 action, and not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
16 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
17 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
18 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
19 statute of limitations.

20 Responding Party objects to the extent this request seeks documents that are no longer
21 active or readily accessible in electronic form which renders this request overly broad and unduly
22 burdensome.

23 Responding Party objects to the extent this request seeks documents or information that is
24 not within the possession, custody, or control of Responding Party.

25 Responding Party objects to the extent this request seeks documents or information that
26 require discovery of information and materials from third parties or sources that are equally if not
27 more accessible to Plaintiffs.

28 Subject to and without waiving the general and specific objections stated above,

1 Responding Party responds that it will make reasonable efforts to identify documents responsive
 2 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
 3 documents.

4 **REQUEST NO. 31 [SIC] REQUEST NO. 36:**

5 All studies, analyses, communications, presentations or other Documents that You have
 6 submitted to or received from any trade association regarding CRT or CRT Products.

7 **RESPONSE TO REQUEST NO. 31 [SIC] REQUEST NO. 36:**

8 Responding Party reasserts and incorporates each of the General Objections and
 9 Objections to Definitions and Instructions set forth above.

10 Responding Party objects to this request on the grounds that it is overly broad, unduly
 11 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 12 including to the extent that it seeks the discovery of documents regarding Responding Party's
 13 sales outside of the United States and unrelated to United States commerce, as such sales are
 14 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 15 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 16 evidence.

17 Responding Party objects to this request on the grounds that it seeks production of
 18 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 19 common interest privilege, or by any other applicable doctrine or privilege.

20 Responding Party objects to this request on the grounds it seeks information and/or
 21 documents that would disclose confidential information protected by any and all rights of privacy
 22 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 23 from disclosure because to do so would cause Responding Party to violate legal and/or
 24 contractual obligations to any other persons or entities.

25 Responding Party objects to this request on the grounds that, to the extent it seeks
 26 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 27 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 28 relevant to the claim or defense of any party, not relevant to the subject matter involved in this

1 action, and not reasonably calculated to lead to the discovery of admissible evidence.

2 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
3 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
4 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
5 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
6 statute of limitations.

7 Responding Party objects to the extent this request seeks documents that are no longer
8 active or readily accessible in electronic form which renders this request overly broad and unduly
9 burdensome.

10 Responding Party objects to the extent this request seeks documents or information that is
11 not within the possession, custody, or control of Responding Party.

12 Responding Party objects that the terms "studies" and "analyses" are vague, ambiguous,
13 and unintelligible, rendering this request overly broad and unduly burdensome, not relevant and
14 not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects to the extent this request seeks documents or information that
16 require discovery of information and materials from third parties or sources that are equally if not
17 more accessible to Plaintiffs.

18 Subject to and without waiving the general and specific objections stated above,
19 Responding Party responds that it will make reasonable efforts to identify documents responsive
20 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
21 documents.

22 **REQUEST NO. 32 [SIC] REQUEST NO. 37:**

23 All statements, announcements, disclosures or press releases issued by You or any of
24 Your competitors relating to CRT or CRT Products.

25 **RESPONSE TO REQUEST NO. 32 [SIC] REQUEST NO. 37:**

26 Responding Party reasserts and incorporates each of the General Objections and
27 Objections to Definitions and Instructions set forth above.

28 Responding Party objects to this request on the grounds that it is overly broad, unduly

1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
2 including to the extent that it seeks the discovery of documents regarding Responding Party's
3 sales outside of the United States and unrelated to United States commerce, as such sales are
4 beyond the scope of this litigation and thereby render the Document Requests overly broad,
5 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to this request on the grounds that it seeks production of
8 documents protected by the attorney-client privilege, work product doctrine, joint defense or
9 common interest privilege, or by any other applicable doctrine or privilege.

10 Responding Party objects to this request on the grounds it seeks information and/or
11 documents that would disclose confidential information protected by any and all rights of privacy
12 under the United States Constitution or any other applicable law, or that is otherwise prohibited
13 from disclosure because to do so would cause Responding Party to violate legal and/or
14 contractual obligations to any other persons or entities.

15 Responding Party objects to this request on the grounds that, to the extent it seeks
16 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
17 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
18 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
19 action, and not reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
21 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
22 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
23 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
24 statute of limitations.

25 Responding Party objects that the definition of the terms "You" and "Your" are vague,
26 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
27 relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

28 Responding Party objects to the extent this request seeks documents that are no longer

1 active or readily accessible in electronic form which renders this request overly broad and unduly
2 burdensome.

3 Responding Party objects to the extent this request seeks documents or information that is
4 not within the possession, custody, or control of Responding Party. Responding Party objects to
5 the extent this request seeks documents or information that require discovery of information and
6 materials from third parties or sources that are equally if not more accessible to Plaintiffs.

7 Subject to and without waiving the general and specific objections stated above,
8 Responding Party responds that it will make reasonable efforts to identify documents responsive
9 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
10 documents.

11 **REQUEST NO. 33 [SIC] REQUEST NO. 38:**

12 All Documents relating to Your policies or practices directed toward compliance with the
13 United States antitrust laws, including any statements signed by Your Employees with pricing,
14 sales or marketing responsibility for CRT or CRT Products, acknowledging their receipt of and
15 compliance with Your antitrust compliance policy.

16 **RESPONSE TO REQUEST NO. 33 [SIC] REQUEST NO. 38:**

17 Responding Party reasserts and incorporates each of the General Objections and
18 Objections to Definitions and Instructions set forth above.

19 Responding Party objects to this request on the grounds that it is overly broad, unduly
20 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
21 including to the extent that it seeks the discovery of documents regarding Responding Party's
22 sales outside of the United States and unrelated to United States commerce, as such sales are
23 beyond the scope of this litigation and thereby render the Document Requests overly broad,
24 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request on the grounds that it seeks production of
27 documents protected by the attorney-client privilege, work product doctrine, joint defense or
28 common interest privilege, or by any other applicable doctrine or privilege.

1 Responding Party objects to this request on the grounds it seeks information and/or
 2 documents that would disclose confidential information protected by any and all rights of privacy
 3 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 4 from disclosure because to do so would cause Responding Party to violate legal and/or
 5 contractual obligations to any other persons or entities.

6 Responding Party objects to this request on the grounds that, to the extent it seeks
 7 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 8 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 9 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 10 action, and not reasonably calculated to lead to the discovery of admissible evidence.

11 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 12 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 13 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 14 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 15 statute of limitations.

16 Responding Party objects to the extent this request seeks documents that are no longer
 17 active or readily accessible in electronic form which renders this request overly broad and unduly
 18 burdensome.

19 Responding Party objects to the extent this request seeks documents or information that is
 20 not within the possession, custody, or control of Responding Party.

21 Responding Party objects that the phrase "directed toward compliance" is vague,
 22 ambiguous, and unintelligible, rendering this request overly broad and unduly burdensome, not
 23 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiving the general and specific objections stated above,
 25 Responding Party responds that it will make reasonable efforts to identify documents responsive
 26 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
 27 documents.

REQUEST NO. 34 [SIC] REQUEST NO. 39:

All Documents relating to, prepared for, submitted to, or received from any foreign governmental or legislative investigative body, including the Canadian Competition Bureau, the European Commission, any agency or representative body of any foreign country, state or other political subdivision, or any law enforcement agency, authority or commission in any foreign country, relating to the production, sale, marketing, pricing or distribution of CRT or CRT Products. This request includes all Documents relating to proffers, transcripts, notes, summaries, testimony, witness statements, or responses to requests for information that You produced to any foreign governmental agency or foreign grand jury, including any Documents produced as part of any plea bargain negotiations or in connection with any application for or grant of amnesty.

RESPONSE TO REQUEST NO. 34 [SIC] REQUEST NO. 39:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks information in excess of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no discovery shall be conducted in this case (including, without limitation, document requests, interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury proceedings concerning CRTs or CRT products, including any party's or witness's communications with the United States, or with any grand jury investigating CRTs or CRT products, except by the order of the Court upon good cause shown and consistent with governing law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

1 Responding Party objects to this request on the grounds that it seeks production of
2 documents protected by the attorney-client privilege, work product doctrine, joint defense or
3 common interest privilege, or by any other applicable doctrine or privilege.

4 Responding Party objects to this request on the grounds it seeks information and/or
5 documents that would disclose confidential information protected by any and all rights of privacy
6 under the United States Constitution or any other applicable law, or that is otherwise prohibited
7 from disclosure because to do so would cause Responding Party to violate legal and/or
8 contractual obligations to any other persons or entities.

9 Responding Party objects to this request on the grounds that, to the extent it seeks
10 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
11 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
12 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
13 action, and not reasonably calculated to lead to the discovery of admissible evidence.

14 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
15 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
16 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
17 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
18 statute of limitations.

19 Responding Party objects to the extent this request seeks documents that are no longer
20 active or readily accessible in electronic form which renders this request overly broad and unduly
21 burdensome.

22 Responding Party objects to this request on the grounds that discovery of documents and
23 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
24 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
25 lead to the discovery of admissible evidence.

26 Subject to and without waiving the objections stated above, Responding Party declines to
27 produce documents that may be responsive to this request.

REQUEST NO. 35 [SIC] REQUEST NO. 40:

All Documents relating to proffers, transcripts, notes, summaries, testimony, witness statements, or responses to requests for information that You produced or were seized by any foreign governmental agency in Italy, Canada, the European Union, India, Hong Kong, Hungary, Thailand, Malaysia, Korea, Japan, Singapore, China or Taiwan.

RESPONSE TO REQUEST NO. 35 [SIC] REQUEST NO. 40:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks information in excess of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no discovery shall be conducted in this case (including, without limitation, document requests, interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury proceedings concerning CRTs or CRT products, including any party's or witness's communications with the United States, or with any grand jury investigating CRTs or CRT products, except by the order of the Court upon good cause shown and consistent with governing law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy

1 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 2 from disclosure because to do so would cause Responding Party to violate legal and/or
 3 contractual obligations to any other persons or entities.

4 Responding Party objects to this request on the grounds that, to the extent it seeks
 5 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 6 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 7 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 8 action, and not reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 10 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 11 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 12 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 13 statute of limitations.

14 Responding Party objects to the extent this request seeks documents that are no longer
 15 active or readily accessible in electronic form which renders this request overly broad and unduly
 16 burdensome.

17 Responding Party objects to this request on the grounds that discovery of documents and
 18 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
 19 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
 20 lead to the discovery of admissible evidence.

21 Subject to and without waiving the objections stated above, Responding Party declines to
 22 produce documents that may be responsive to this request.

23 **REQUEST NO. 36 [SIC] REQUEST NO. 41:**

24 Copies of all subpoenas or requests for production of Documents issued by any foreign
 25 governmental or legislative investigative body referring or relating to CRT or CRT Products
 26 during the relevant period.

27 **RESPONSE TO REQUEST NO. 36 [SIC] REQUEST NO. 41:**

28 Responding Party reasserts and incorporates each of the General Objections and

1 Objections to Definitions and Instructions set forth above.

2 Responding Party objects to this request on the grounds that it is overly broad, unduly
3 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
4 including to the extent that it seeks the discovery of documents regarding Responding Party's
5 sales outside of the United States and unrelated to United States commerce, as such sales are
6 beyond the scope of this litigation and thereby render the Document Requests overly broad,
7 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Responding Party objects to this request on the grounds that it seeks information in excess
10 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no
11 discovery shall be conducted in this case (including, without limitation, document requests,
12 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
13 proceedings concerning CRTs or CRT products, including any party's or witness's
14 communications with the United States, or with any grand jury investigating CRTs or CRT
15 products, except by the order of the Court upon good cause shown and consistent with governing
16 law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

17 Responding Party objects to this request on the grounds that it seeks production of
18 documents protected by the attorney-client privilege, work product doctrine, joint defense or
19 common interest privilege, or by any other applicable doctrine or privilege.

20 Responding Party objects to this request on the grounds it seeks information and/or
21 documents that would disclose confidential information protected by any and all rights of privacy
22 under the United States Constitution or any other applicable law, or that is otherwise prohibited
23 from disclosure because to do so would cause Responding Party to violate legal and/or
24 contractual obligations to any other persons or entities.

25 Responding Party objects to this request on the grounds that, to the extent it seeks
26 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
27 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
28 relevant to the claim or defense of any party, not relevant to the subject matter involved in this

1 action, and not reasonably calculated to lead to the discovery of admissible evidence.

2 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
3 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
4 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
5 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
6 statute of limitations.

7 Responding Party objects to the extent this request seeks documents that are no longer
8 active or readily accessible in electronic form which renders this request overly broad and unduly
9 burdensome.

10 Responding Party objects to this request on the grounds that discovery of documents and
11 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
12 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
13 lead to the discovery of admissible evidence.

14 Subject to and without waiving the objections stated above, Responding Party declines to
15 produce documents that may be responsive to this request.

16 **REQUEST NO. 37 [SIC] REQUEST NO. 42:**

17 All Documents relating to, prepared for, submitted to, or received by You as a result of
18 any investigation or research conducted either internally or by an outside entity with respect to
19 price fixing, price manipulation or manipulation of production or capacity of CRT or CRT
20 Products.

21 **RESPONSE TO REQUEST NO. 37 [SIC] REQUEST NO. 42:**

22 Responding Party reasserts and incorporates each of the General Objections and
23 Objections to Definitions and Instructions set forth above.

24 Responding Party objects to this request on the grounds that it is overly broad, unduly
25 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
26 including to the extent that it seeks the discovery of documents regarding Responding Party's
27 sales outside of the United States and unrelated to United States commerce, as such sales are
28 beyond the scope of this litigation and thereby render the Document Requests overly broad,

1 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Responding Party objects to this request on the grounds that it seeks information in excess
4 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that “no
5 discovery shall be conducted in this case (including, without limitation, document requests,
6 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
7 proceedings concerning CRTs or CRT products, including any party’s or witness’s
8 communications with the United States, or with any grand jury investigating CRTs or CRT
9 products, except by the order of the Court upon good cause shown and consistent with governing
10 law.” Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

11 Responding Party objects to this request on the grounds that it seeks production of
12 documents protected by the attorney-client privilege, work product doctrine, joint defense or
13 common interest privilege, or by any other applicable doctrine or privilege.

14 Responding Party objects to this request on the grounds it seeks information and/or
15 documents that would disclose confidential information protected by any and all rights of privacy
16 under the United States Constitution or any other applicable law, or that is otherwise prohibited
17 from disclosure because to do so would cause Responding Party to violate legal and/or
18 contractual obligations to any other persons or entities.

19 Responding Party objects to this request on the grounds that, to the extent it seeks
20 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
21 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
22 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
23 action, and not reasonably calculated to lead to the discovery of admissible evidence.

24 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
25 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
26 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
27 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
28 statute of limitations.

1 Responding Party objects to the extent this request seeks documents that are no longer
2 active or readily accessible in electronic form which renders this request overly broad and unduly
3 burdensome.

4 Responding Party objects to this request on the grounds that discovery of documents and
5 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
6 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
7 lead to the discovery of admissible evidence.

8 Subject to and without waiving the objections stated above, Responding Party declines to
9 produce documents that may be responsive to this request.

10 **REQUEST NO. 38 [SIC] REQUEST NO. 43:**

11 All Documents relating to the termination, retirement, discipline, discharge or suspension
12 of any director, officer, or Employee who had any responsibility relating to the production,
13 manufacture, distribution, marketing, pricing or sale of CRT or CRT Products.

14 **RESPONSE TO REQUEST NO. 38 [SIC] REQUEST NO. 43:**

15 Responding Party reasserts and incorporates each of the General Objections and
16 Objections to Definitions and Instructions set forth above.

17 Responding Party objects to this request on the grounds that it is overly broad, unduly
18 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
19 including to the extent that it seeks the discovery of documents regarding Responding Party's
20 sales outside of the United States and unrelated to United States commerce, as such sales are
21 beyond the scope of this litigation and thereby render the Document Requests overly broad,
22 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Responding Party objects to this request on the grounds that it seeks production of
25 documents protected by the attorney-client privilege, work product doctrine, joint defense or
26 common interest privilege, or by any other applicable doctrine or privilege.

27 Responding Party objects to this request on the grounds it seeks information and/or
28 documents that would disclose confidential information protected by any and all rights of privacy

1 under the United States Constitution or any other applicable law, or that is otherwise prohibited
2 from disclosure because to do so would cause Responding Party to violate legal and/or
3 contractual obligations to any other persons or entities.

4 Responding Party objects to this request on the grounds that, to the extent it seeks
5 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
6 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
7 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
8 action, and not reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
10 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
11 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
12 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
13 statute of limitations.

14 Responding Party objects to the extent this request seeks documents that are no longer
15 active or readily accessible in electronic form which renders this request overly broad and unduly
16 burdensome.

17 Responding Party objects on the grounds that, to the extent this request seeks documents
18 not related to the allegations in the Complaint, this request is overly broad and unduly
19 burdensome, and purports to call for information that is not relevant to the claim or defense of
20 any party, not relevant to the subject matter involved in this action, and not reasonably calculated
21 to lead to the discovery of admissible evidence.

22 Responding Party objects to this request on the grounds that it seeks information in excess
23 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no
24 discovery shall be conducted in this case (including, without limitation, document requests,
25 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
26 proceedings concerning CRTs or CRT products, including any party's or witness's
27 communications with the United States, or with any grand jury investigating CRTs or CRT
28 products, except by the order of the Court upon good cause shown and consistent with governing

1 law.” Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

2 Subject to and without waiving the objections stated above, Responding Party declines to
3 produce documents that may be responsive to this request.

4 **REQUEST NO. 39 [SIC] REQUEST NO. 44:**

5 All Documents referring to or relating to plaintiffs in this litigation.

6 **RESPONSE TO REQUEST NO. 39 [SIC] REQUEST NO. 44:**

7 Responding Party reasserts and incorporates each of the General Objections and
8 Objections to Definitions and Instructions set forth above.

9 Responding Party objects to this request on the grounds that it is overly broad, unduly
10 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
11 including to the extent that it seeks the discovery of documents regarding Responding Party’s
12 sales outside of the United States and unrelated to United States commerce, as such sales are
13 beyond the scope of this litigation and thereby render the Document Requests overly broad,
14 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Responding Party objects to this request on the grounds that it seeks production of
17 documents protected by the attorney-client privilege, work product doctrine, joint defense or
18 common interest privilege, or by any other applicable doctrine or privilege.

19 Responding Party objects to this request on the grounds it seeks information and/or
20 documents that would disclose confidential information protected by any and all rights of privacy
21 under the United States Constitution or any other applicable law, or that is otherwise prohibited
22 from disclosure because to do so would cause Responding Party to violate legal and/or
23 contractual obligations to any other persons or entities.

24 Responding Party objects to this request on the grounds that, to the extent it seeks
25 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
26 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
27 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
28 action, and not reasonably calculated to lead to the discovery of admissible evidence.

1 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 2 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 3 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
 4 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
 5 statute of limitations.

6 Responding Party objects to the extent this request seeks documents or information that is
 7 not within the possession, custody, or control of Responding Party.

8 Responding Party objects to the extent this request seeks documents or information that
 9 require discovery of information and materials from third parties or sources that are equally if not
 10 more accessible to Plaintiffs.

11 Subject to and without waiving the objections stated above, Responding Party declines to
 12 produce documents that may be responsive to this request.

13 **REQUEST NO. 40 [SIC] REQUEST NO. 45:**

14 All Documents that You claim would have been available to the plaintiffs or any
 15 purchaser of CRT or CRT Products prior to November 2007, which should have caused the
 16 plaintiffs or any such purchaser to investigate whether there was a conspiracy to fix, raise,
 17 maintain or stabilize the prices or to control or restrict sales of CRT or CRT Products in the
 18 United States.

19 **RESPONSE TO REQUEST NO. 40 [SIC] REQUEST NO. 45:**

20 Responding Party reasserts and incorporates each of the General Objections and
 21 Objections to Definitions and Instructions set forth above.

22 Responding Party objects to this request on the grounds that it is overly broad, unduly
 23 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 24 including to the extent that it seeks the discovery of documents regarding Responding Party's
 25 sales outside of the United States and unrelated to United States commerce, as such sales are
 26 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 27 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 28 evidence.

1 Responding Party objects to this request on the grounds that it seeks production of
2 documents protected by the attorney-client privilege, work product doctrine, joint defense or
3 common interest privilege, or by any other applicable doctrine or privilege.

4 Responding Party objects to this request on the grounds it seeks information and/or
5 documents that would disclose confidential information protected by any and all rights of privacy
6 under the United States Constitution or any other applicable law, or that is otherwise prohibited
7 from disclosure because to do so would cause Responding Party to violate legal and/or
8 contractual obligations to any other persons or entities.

9 Responding Party objects to this request on the grounds that, to the extent it seeks
10 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
11 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
12 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
13 action, and not reasonably calculated to lead to the discovery of admissible evidence.

14 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
15 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
16 admissible evidence as the Complaint does not allege a continuing conspiracy, the end of the
17 class period is November 25, 2007, and claims prior to November 26, 2003, are barred by the
18 statute of limitations.

19 Responding Party objects to the extent this request seeks documents that are no longer
20 active or readily accessible in electronic form which renders this request overly broad and unduly
21 burdensome.

22 Responding Party objects to the extent this request seeks documents or information that is
23 not within the possession, custody, or control of Responding Party.

24 Responding Party objects to the extent this request seeks documents or information that
25 require discovery of information and materials from third parties or sources that are equally if not
26 more accessible to Plaintiffs.

27 Responding Party objects to this request as inappropriately propounded as a document
28 request, as it seeks information more easily obtainable through other means and/or as to which

1 Plaintiffs bear the burden of proof.

2 Responding Party objects to the extent this request is argumentative and assumes facts not
3 in evidence.

4 Subject to and without waiving the objections stated above, Responding Party declines to
5 produce documents that may be responsive to this request.

6 Dated: May 12, 2010

MORGAN, LEWIS & BOCKIUS LLP

7
8
9 By



Diane L. Webb
Attorneys for Defendant
HITACHI, LTD.